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June 16, 2023

**VIA ECF**

The Honorable LaShann DeArcy Hall  
United States District Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201  
New York, NY 11201

**Re:    Torres v. Maman Group New York Corp. et al**  
**Case No. 1:22-cv-05029-LDH-RML**

The Honorable LaShann DeArcy Hall:

Our firm represents Defendants Maman Group New York Corp. and Maman Tribeca LLC (“Defendants”). We write jointly and with the consent of Jason Mizrahi, counsel for Plaintiff Alejandro Torres (“Plaintiff”), to request an extension of the discovery deadline.

The parties are working toward resolution of this matter and are participating in the Court’s mediation program on June 27, 2023. The mediation was initially scheduled for April 25, 2023, but was adjourned due to a scheduling conflict. Additionally, the undersigned was out of the office for the month of May for his wedding and honeymoon. Given the foregoing, the parties need additional time to complete discovery in the event that mediation is unsuccessful. The current discovery end date is June 16, 2023. Accordingly, the parties respectfully request an extension of the deadline to complete fact discovery (including depositions) to September 14, 2023 and the deadline to file contemplated dispositive motions to October 14, 2023. This is the parties’ first request for an extension of the discovery deadline.

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Constangy, Brooks, Smith & Prophete, LLP

Thank you for Your Honor's consideration to this request.

Respectfully and jointly submitted,

/s/ Jason Mizrahi

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